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JOSE FERNANDO GOMEZ-MOREIRA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSE FERNANDO GOMEZ-  
MOREIRA,

15 Defendant.  
16

Case No. 1:20-cr-00151-NONE-SKO

**STIPULATION TO CONTINUE  
SENTENCING HEARING and ORDER**

Date: October 1, 2021

Time: 9:30 a.m.

Judge: Hon. Dale A. Drozd

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18 The parties, through their respective counsel, Laura Withers, Assistant United States  
19 Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender,  
20 counsel for the defendant, Jose Fernando Gomez-Moreira, hereby stipulate that the sentencing  
21 hearing set for Friday, October 1, 2021 at 9:30 a.m., before the Honorable Dale A. Drozd, be  
22 continued to Friday, October 15, 2021 at 9:30 a.m.

23 The parties wish to continue sentencing in this matter at the request of defense counsel, as  
24 defense counsel requires additional time to gather and review records. Defense counsel recently  
25 received Mr. Gomez-Moreira's children's school records as two of his children require special  
26 education services. The records of their assessments are in the Spanish language and require  
27 translation. In addition, defense counsel is still awaiting delivery of records related to Mr. Gomez-  
28 Moreira's prior incarceration in the state of Rhode Island, which have not yet arrived. Defense had

1 fully expected the records in question by the filing deadline, apologizes for the inconvenience  
2 caused by the delay. The government does not object.

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8 Respectfully submitted,

9 PHILLIP A. TALBERT  
Acting United States Attorney

10 Dated: September 29, 2021

11 /s/ Laura Withers  
LAURA WITHERS  
Assistant U.S. Attorney

12  
13 Dated: September 29, 2021

14 HEATHER E. WILLIAMS  
Federal Defender

15 /s/ Benjamin A. Gerson  
16 BENJAMIN A. GERSON  
Assistant Federal Defender  
17 Attorney for Defendant  
18 JOSE FERNANDO GOMEZ-MOREIRA

19  
20 **ORDER**

21 **GOOD CAUSE APPEARING**, the above stipulation to continue the sentencing hearing  
22 in case 1:20-cr-00151 to October 15, 2021 is hereby accepted and adopted as the order of this  
23 Court.

24 IT IS SO ORDERED.

25 Dated: **September 30, 2021**

26 Dale A. Ingh  
UNITED STATES DISTRICT JUDGE